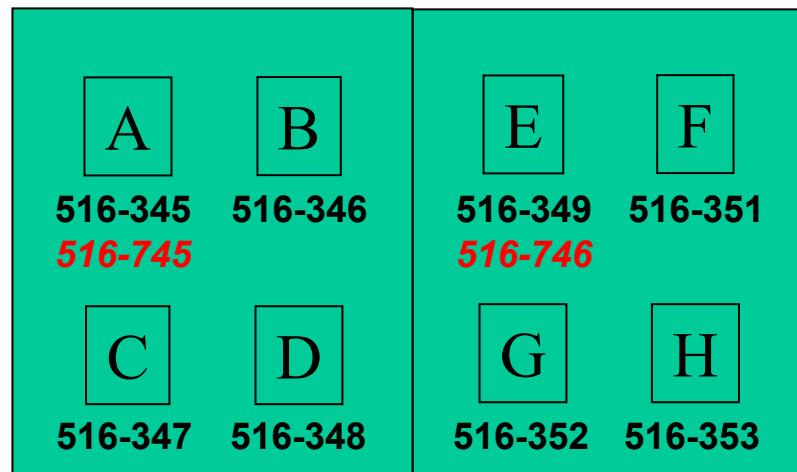


**Pooling & Porting
of
Grandfathered Central Office Codes**

Grandfathered Codes (NXXs)

What Are They - 1



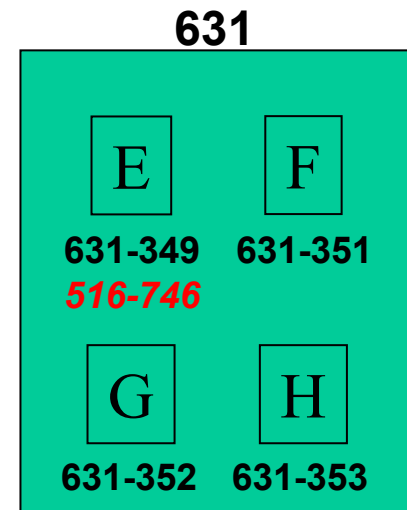
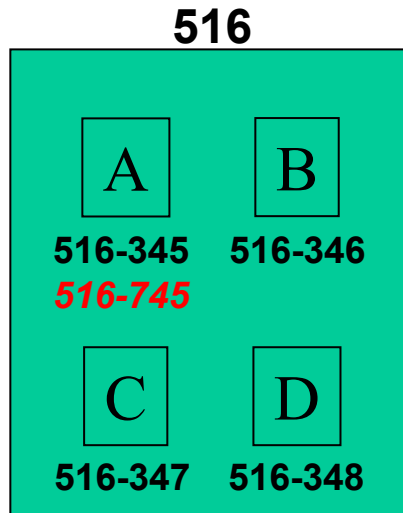
One Area Code (516)

Eight Rate Centers (illustrative)

Each NXX Assigned to a Specific Rate Center

Grandfathered Codes (NXXs)

What Are They - 2



State Orders an Area Code Split (516) & (631)
State Allows CMRS Grandfathered Codes (516-746)
516-746 is Active in the (631) Geography

Grandfathered Codes

Pooling & Porting - Legal Issues

- State Orders permit only CMRS carriers to use grandfathered codes
- Porting currently defined as “ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers . . . when switching from one telecommunications carrier to another” 52.21(k)
- WNP puts state delegated authority in conflict with porting rules
- Porting creates “mini-overlays” which may trigger mandatory 10D dialing requirements of 52.19(c)(3)(ii) (and may conflict with state order / goal of maintaining 7-digit dialing for wireline customers)

Grandfathered Codes

Pooling & Porting - Customer Confusion

- Customers that port a grandfathered TN to a wireline location will be required to dial 10 digits on most outgoing calls
- Local NPA calls initiated to these wireline subscribers would require 10 digit dialing
- Associating an NPA with a specific geography - an oft cited goal of state NPA relief orders that select a split as the relief method - is no longer possible
- Pooling & Porting of grandfathered codes creates “islands”

Grandfathered Codes

Pooling & Porting - Carrier Requirements

- Requires “mini-overlay” for all rate centers which contain grandfathered codes
- Additional trunking to support E911 and operator services
 - Convert 7D signaling trunks to 10D signaling trunks
 - Add trunks
- Non-native NPA must reside as an originating TN for all COs in a grandfathered rate center
- All the switches in an NPA with grandfathered codes must be modified for local dialing
- Customer education

Grandfathered Codes

Pooling & Porting Prohibition

De Minimis Impact

- 500 grandfathered NXXs little more than one percent of 38,000 NXXs assigned to CMRS
- Issue is wireless-to-wireline porting - for all wireline carriers
- Porting of TNs from grandfathered codes delays ability of states to eliminate these codes through customer-sensitive policies
- Prohibition should be co-extensive with life of grandfathered code

Grandfathered Codes

Recommendation

- In 2002, FCC allowed modification of Thousands Block Pooling Guidelines to prevent assignment of pooled blocks from grandfathered codes
- FCC should clarify that area code relief decisions that allow grandfathered codes include an implicit prohibition against pooling and porting
- Alternatively, the FCC should place the USTA Grandfathered NXX Codes Petition out for Public Notice and delay the porting of such codes until an FCC determination can be made based upon a complete record